

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

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In re POLYURETHANE FOAM ANTITRUST  
LITIGATION  
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This document relates to:  
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ALL CASES  
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) MDL Docket No. 2196  
) Index No. 10-MD-2196 (JZ)  
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**STIPULATED PROPOSED AGENDA FOR JANUARY 19, 2011 CONFERENCE**

WHEREAS, in an Order dated December 10, 2010, the Court set an initial conference with the parties for January 19, 2011; and

WHEREAS, that Order stated “Counsel shall confer and file a Stipulated Proposed Agenda, including a case management schedule, by 1/12/11”; and

WHEREAS, the parties have met and conferred in good faith regarding the agenda for the January 19 initial conference, and the details of an initial case management order.

THEREFORE, by and through their undersigned representatives, the parties stipulate that:

1. The parties respectfully submit the following proposed agenda for the January 19, 2011 conference:

- (a) Case leadership [if necessary];
- (b) Determination of track assignment, which the parties recommend to be Complex, pursuant to Local Rules 16.2 and 16.3;
- (c) Ongoing investigation by the Department of Justice;

- (d) Whether the case is suitable for reference to an ADR program, and if so, the procedures for neutral appointment;
- (e) Whether the parties consent to the jurisdiction of a Magistrate Judge pursuant to 28 U.S.C. § 636(c);
- (f) Proposed case management order(s);
- (g) Procedures for developing ESI protocols; and
- (h) Process for proposed protective order.

2. Attached to this stipulation is a proposed case management order, the details of which have been agreed by the parties.